

McPherson, Michele J. (LSS-Dal-LT)

From: Dilip Jana <janadilip@gmail.com>
Sent: Thursday, April 3, 2025 1:59 AM
To: Jones, Morgan (Assoc-DAL-LT)
Cc: Hampton, Holmes (Assoc-DAL-LT); Wahby, Peter (Shld-Dal-LT)
Subject: Re: Proposed Scheduling Order [Jana v Walmart]

Dear Counsels:

During the Meet & Confer meeting on March 24, 2025, I opposed your proposed Protective Order because you did not articulate why we need a Protective Order. I sent you Interrogatory and Production of Documents on last Friday, March 28, 2025. If you want to object (due to Confidentiality, Attorney Client Privilege etc) to any items in the Interrogatory and Production of Documents request, please call or email me before objecting in order to attempt to narrow the question or avoid the objectionable portion or aspect. I am available at any time.

Please be advised that Attorney client privilege or Company Confidential materials do not supersede federal whistleblower protections under the Sarbanes Oxley Act (SOX), it is true for CAARA as well as SOX and CAARA are similar statutes.

The Complaint has a section "WALMART'S MATERIALLY FALSE, FRAUDULENT STATEMENTS AND ALTERNATION OF EVIDENCE" and it states, " to cover up Walmart's retaliation due to Dr. Jana's protected Whistleblower activities, Walmart and it's attorneys knowingly and willfully..made materially false, fraudulent statements /representation and altered a document for the purpose of committing fraud ..possibly committing further crimes.. Upon close inspection, one can find that EXHIBIT 2 is an altered version of EXHIBIT 1 which appears to be for the purpose of committing fraud, thus making it a crime under Federal Laws."

There are quite a few Interrogatories and Production of Documents requests that I sent were related to alteration of documents. The Court must accept materials presented in the Complaint as true and I believe your desperate effort for a Protective Order is nothing but to hide the material facts that will reveal Walmart's possible crime behind an artificial wall of confidentiality through a Protective Order.

Therefore I don't see any need for any Protective Order and I am opposed to it.

Kind regards,

Dr. Dilip Jana

800 Fairlawn St, Allen, TX 75002.

Ph: 318-243-9743

On Wed, Apr 2, 2025 at 1:54 PM <Morgan.Jones@gtlaw.com> wrote:

Dilip: We are following up on the below. You indicated during the Rule 26(f) conference that you are opposed to the entry of any protective order in this case. Could you please confirm your stance has not changed? We intend to move for entry of Judge Jordan's [standard protective order](#) and it would be ideal if we could file the motion jointly to protect both parties' confidential information.

Please let us know.

Morgan Jones
Associate

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From: Hampton, Holmes (Assoc-DAL-LT) <Holmes.Hampton@gtlaw.com>
Sent: Monday, March 31, 2025 1:37 PM
To: janadilip@gmail.com
Cc: Wahby, Peter (Shld-Dal-LT) <Peter.Wahby@gtlaw.com>; Jones, Morgan (Assoc-DAL-LT) <Morgan.Jones@gtlaw.com>
Subject: RE: Proposed Scheduling Order

Dilip,

We will send you a draft Joint Report of Conference in advance of the April 11 due date. In the meantime, please see the attached correspondence.

Separately, please confirm whether you are opposed to entry of the Court's standard protective order, which can be found at [this link](#) on the Court's website.

Holmes Hampton
Associate

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From: Dilip Jana <janadilip@gmail.com>
Sent: Monday, March 31, 2025 9:29 AM
To: Hampton, Holmes (Assoc-DAL-LT) <Holmes.Hampton@gtlaw.com>
Cc: Wahby, Peter (Shld-Dal-LT) <Peter.Wahby@gtlaw.com>; Jones, Morgan (Assoc-DAL-LT) <Morgan.Jones@gtlaw.com>
Subject: Re: Proposed Scheduling Order

EXTERNAL TO GT

Thanks Mr. Holmes for putting this together; I really appreciate it. Proposed Scheduling Order looks good. Thank you.

I received a foreclosure notification from my mortgage lender's attorney, I am extremely busy dealing with the foreclosure situation and stressed out of having nowhere to go with five minor children. Would you mind taking a lead on the Joint Conference report? I'll really appreciate it.

Kind regards,

Dr. Dilip Jana

800 Fairlawn St, Allen, TX 75002.

Ph: 318-243-9743

On Mon, Mar 24, 2025 at 4:16 PM <Holmes.Hampton@gtlaw.com> wrote:

Dilip,

As you discussed with Peter today, attached is a Proposed Scheduling Order. You'll see that we inputted the dates that correspond with the Court's standard schedule.

Let us know if you have any questions regarding the attached.

Holmes Hampton
Associate

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Thanks
Dilip

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Thanks
Dilip